

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Paulette Pahnke, individually and
As parent and natural guardian of
Brittany Newman, Alyssa Newman,
and Michael Newman, minors,

Court File No. 04-1299(PAM/RLE)

Plaintiff,

v.

Anderson Moving and Storage,
Home Apartment Development, LLC,
County of Houston, City of LaCrescent,
John Doe, and Jim Doe,

**NOTICE OF MOTIONS AND MOTIONS
FOR SUMMARY JUDGMENT AGAINST
ANDERSON MOVING AND STORAGE AND
HOME APARTMENT DEVELOPMENT, LLC**

Defendants.

TO: Defendants above named and their counsel of record.

PLEASE TAKE NOTICE that on May 4, 2005, at 10:00 a.m., Plaintiff will bring a Motion for Summary Judgment before the Honorable Paul A. Magnuson at the United States District Court, District of Minnesota, Warren E. Burger Federal Building, 316 North Robert Street, Room 1738, St. Paul, Minnesota 55101, or as soon thereafter as the matter may be heard.

Plaintiff moves for Summary Judgment against Defendants Anderson Moving and Storage and Home Apartment Development, LLC, as follows:

1. That Home Apartment Development, LLC violated §504B.365, Subd. 3, and Plaintiff is entitled to damages against Home Apartment Development, LLC pursuant to §504B.365, Subd 5., and §504B.231.
2. That Anderson Moving and Storage violated §504B.365, Subd. 3, and Plaintiff is entitled to damages against Anderson Moving and Storage pursuant to §504B.365, Subd 5., and §504B.231.

The above Summary Judgment Motions are made pursuant to Rule 56 of the Federal Rules of Civil Procedure as there is no genuine issue as to any material fact and Plaintiff is entitled to judgment as a matter of law.

Said Motions will be made upon all of the files, records and proceedings herein and upon the Memorandum of Law and Affidavits submitted therewith.

Dated: March ___, 2005.

William L. French, #131945
P.O. Box 6323
627 Woodhaven Court NE
Rochester, MN 55903
Telephone: (507) 280-6136
-and-
Jeffrey A. Hanson, #40897
Hanson Law Firm
402 S. Mantorville Ave.
Kasson, MN 55944
Telephone: (507) 634-3202

Attorneys for Paulette Pahnke